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*Attorneys for APG Financial, Inc.*

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**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF UTAH  
CENTRAL DIVISION**

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In re:

Travis W. Green,  
Debtor,  
and

Christina Gibson-Green,  
Joint Debtor.

Chapter 13

Case No. 14-32955

Judge Joel T. Marker

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**NOTICE OF NON-OPPOSITION TO APG FINANCIAL, INC.'S MOTION FOR  
RELIEF FROM AUTOMATIC STAY**

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Chad S. Pehrson, counsel for APG Financial, Inc. ("APG"), certifies as follows:

1. On January 5, 2015, APG filed its Motion for Relief from Stay (the "Motion").
2. On January 5, 2015, a Notice of Motion and Opportunity for Hearing on the Motion (the "Notice") was served on the Debtor, Debtor's counsel, the chapter 13 trustee, the US Trustee's office, and the 25 largest creditors listed in the Debtor's schedules.

3. The Notice directed that responses or objections to the Motion be filed on or before January 22, 2014, and indicated that in the absence of a timely response, the relief sought in the Motion may be granted without a hearing. No response or objection to the Motion has been filed and the deadline for filing objections to the Motion has passed.

4. An opportunity for hearing on the Motion has been scheduled for January 28, 2016 at 9:00 a.m. (the "Hearing").

WHEREFORE, APG respectfully requests that the Hearing be stricken and that the Court enter an Order granting the Motion in the form submitted.

DATED this 26th day of January 2014.

PARR BROWN GEE & LOVELESS

/s/ Chad S. Pehrson  
Chad S. Pehrson

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a copy of the foregoing was served this 26<sup>th</sup> Day of January 2015, by the Court's CM/ECF electronic transmission or by United States mail on the following:

Sarah L. Matthews (CM/ECF)

Kevin R. Anderson, trustee (CM/ECF) United

United States Trustee (CM/ECF)

Travis W. Green (US MAIL)  
5040 Niagra Cir.  
Salt Lake City, UT 84118

Christina Gibson-Green (US MAIL)  
5040 Niagra Cir.  
Salt Lake City, UT 84118

/s Chad S. Pehrson